THIS IS THE <u>BEGINNING</u> OF ADMINISTRATIVE FINE CASE # 3445





2019 MAR 20 AM 9: 26.

SENSITIVE

March 20, 2019

MEMORANDUM

TO:

The Commission

THROUGH:

Alec Palmer

Staff Director

FROM:

Patricia C. Orrock PCO

Chief Compliance Officer

Debbie Chacona DC
Assistant Staff Director
Reports Analysis Division

BY:

Kristin D. Roser/Ben Holly BH

Reports Analysis Division Compliance Branch

SUBJECT:

Reason To Believe Recommendation - 2018 30 Day Post-General Report

(Unauthorized Filers) for the Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file or timely file the 2018 30 Day Post-General Report in accordance with 52 U.S.C. § 30104(a). The list is comprised of unauthorized committees that failed to file or timely file the 2018 30 Day Post-General Report.

The committees appearing on the 30 Day Post-General Report list either failed to file the report, filed the report within thirty (30) days of the due date (considered a late filed report), or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with 11 C.F.R. § 111.43, these committees should be assessed the civil money penalties indicated in the attachment.

In order to determine the level of activity for unauthorized quarterly filers that failed to file or failed to timely file the 30 Day Post-General Report, the Reports Analysis Division (RAD) used the following procedures and criteria:

- Every 30 Day Post-General Report (30 Day Report) submitted by an unauthorized quarterly filer that covered the period from October 1, 2018 through November 26, 2018 (57 days), was reviewed for activity which would have required the filing of a 12 Day Pre-General Report (12 Day Report). If our research indicated that the filing of a 12 Day Report was required, we utilized a two-step method to arrive at the estimated level of activity on which to base the fine amount. First, we took the sum of all itemized receipts and disbursements that should have been disclosed on a 12G. Second, if the committee had any unitemized activity, a per diem level of activity was used by multiplying the total amount of activity on the report by 29.82% (17 days (12G Filing Period))57 days (30G Filing Period)).
- The committees identified through this process as failing to file or failing to timely file the 12 Day Report were included in the Reason to Believe Recommendation circulated to the Commission on March 13, 2019. If the same committee also failed to file the 30 Day Report in a timely manner, we based the 30 Day Report fine on the amount of the remaining level of activity. We arrived at this amount by subtracting the estimated level of activity for the 12 Day Report from the total amount of activity on the 30 Day Report. In these cases, the committees will also be assessed a fine for the 30 Day Report based on the estimated levels of activity described above and are included on the attached list.
- Every Year-End Report (YE) submitted by an unauthorized quarterly filer that covered the period from October 1, 2018 through December 31, 2018 (92 days) was reviewed for activity which would have required the filing of a 30G. If our research indicated that a 30G was required, we utilized a three-step method to arrive at the activity on which to base the 30G fine amount. First, we took the sum of all itemized receipts and disbursements that should have been disclosed on a 30G. Second, if the committee had any unitemized activity, a per diem level of this activity was calculated by multiplying the total amount of unitemized activity on the report by 61.96% (57 days (30G Filing Period)/92 days (YE Filing Period)). Third, we took the sum of the amounts calculated in steps one and two to arrive at the level of activity assigned to the 30G. If the same committee was required to file the 12 Day Report, but failed to file this report, we utilized a three-step method to arrive at the activity on which to base the 30G fine amount. First, we took the sum of all itemized receipts and disbursements that should have been disclosed on a 30G. Second, if the committee had any unitemized activity, a per diem level of this activity was calculated by multiplying the total amount of unitemized activity on the report by 43.48% (40 days (30G Filing Period)/92 days (YE Filing Period)). Third, we took the sum of the amounts calculated in steps one and two to arrive at the level of activity assigned to the 30G.

Recommendation

- 1. Find reason to believe that the political committees and their treasurers, in their official capacity, listed on the RTB Circulation Report violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.
- 2. Send the appropriate letters.

3/19/2019 3:02 PM

Federal Election Commission Reason to Believe Circulation Report 2018 POST-GENERAL Not Election Sensitive 12/06/2018 UNAUTH

| | | _ | | | | | | | | |
|-----|-----------|----------------|-----------|-----------|----|--------------|-----------|-----|-------------|---|
| AF# | Committee | Committee Name | Treasurer | Threshold | PV | Receipt Date | Days Late | LOA | RTB Penalty | l |
| | ID | i | į. | | | 1 1 | | i | 1 | i |

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| AF# | Committee | Committee Name | Treasurer | Threshold | PV | Receipt Date | Days Late | LOA | RTB Penalty |
|------|--------------|------------------------------|---------------|-----------|----|--------------|-----------|----------------|-------------|
| | | | | | | | | | |
| | | | | | | | | | |
| - | | | | | | | | 1 | |
| 3645 | C00131706 | PIPEFITTERS LOCAL UNION #524 | PATRICK DOLAN | \$194,859 | 0 | ļ | Not Filed | \$32,477 (est) | \$1,230 |

BEFORE THE FEDERAL ELECTION COMMISSION

| In the Matter of | |
|--|--|
| Reason To Believe Recommendation - 2018 | |
| 30 Day Post-General Report (Unauthorized | |
| Filers) for the Administrative Fine Program: | |

190927278820

Page 2

PIPEFITTERS LOCAL UNION #524, and) AF# 3645 DOLAN, PATRICK as treasurer;)

CERTIFICATION

I, Dayna C. Brown, Secretary and Clerk of the Federal Election Commission, do hereby certify that on March 21, 2019 the Commission took the following actions on the Reason To Believe Recommendation - 2018 30 Day Post-General Report (Unauthorized Filers) for the Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated March 20, 2019, on the following committees:

19092723825

AF#3645 Decided by a vote of 4-0 to: (1) find reason to believe that PIPEFITTERS LOCAL UNION #524, and DOLAN, PATRICK in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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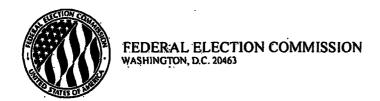
19092723828

Attest:

Much 21,2019

Dayna C. Brown

Secretary and Clerk of the Commission



March 21, 2019

Patrick Dolan, in official capacity as Treasurer Pipefitters Local Union #524 711 Corey Street Scranton, PA 18505

C00131706 AF#: 3645

Dear Mr. Dolan:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a 30 Day Post-General Report of Receipts and Disbursements in a calendar year in which a regularly scheduled general election is held. This report, covering the period October 1, 2018 through November 26, 2018 shall be filed no later than December 6, 2018. 52 U.S.C. § 30104(a). Because records at the Federal Election Commission ("FEC") indicate that you did not file this report within thirty (30) days of the due date, the report is considered not filed for the purpose of calculating the civil money penalty. You should file the report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109(a)(4). On March 21, 2019, the FEC found that there is reason to believe ("RTB") that Pipefitters Local Union #524 and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file timely this report on or before December 6, 2018. Based on the FEC's schedules of civil money penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$1,230. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See https://www.fec.gov/af/pay.shtml 11 CFR § 111.34. Your payment of \$1,230 is due within forty (40) days of the finding, or by April 30, 2019, and is based on these factors:

Sensitivity of Report: Not Election Sensitive

Level of Activity: \$32,477 Number of Days Late: Not Filed

Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response to the FEC's Office of Administrative Review, 1050 First Street, NE, Washington, DC 20002. Your response must include the AF# (found at the top of page 1 under your committee's identification number) and be received within forty (40) days of the Commission's RTB finding, or April 30, 2019. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 CFR § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 CFR § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. Id. Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 CFR § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. District Court under 52 U.S.C. § 30109. 11 CFR § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Pipefitters Local Union #524 and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 et seq. The FEC may take any and all appropriate

action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the calculated civil money penalty, follow the payment instructions on page 4 of this letter. Upon receipt of your payment, the FEC will send you a final determination letter.

NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS

4. Partial Payments

If you make a payment in an amount less than the calculated civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assesses upon making a final determination.

5. Settlement Offers

Any offer to settle or compromise a debt owed to the Commission, including making a payment in an amount less than the calculated civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assesses upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109(a)(2). Unless you notify the FEC in writing that you wish the matter to be made public, it will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and 30109(a)(12)(A) until it is placed on the public record at the conclusion of this matter in accordance with 11 CFR § 111.42.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at https://www.fec.gov/af/pay.shtml If you have questions regarding the payment of the calculated civil money penalty, please contact Ben Holly in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1158) or (202) 694-1158.

On behalf of the Commission,

Ellen L. Womato a. 0-

Ellen L. Weintraub

Chair

ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$1,230 for the 2018 Post-General Report.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit www.fec.gov/af/pay.shtml to be directed to Pay.gov's Administrative Fine Program Payment form.

This penalty may also be paid by check or money order, made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission P.O. Box 979058 St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please send to:

U.S. Bank - Government Lockbox FEC #979058 1005 Convention Plaza Attn: Government Lockbox, SL-MO-C2GL St. Louis, MO 63101

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Pipefitters Local Union #524

FEC ID#: 'C00131706

AF#: 3645

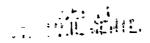
PAYMENT DUE DATE: April 30, 2019

PAYMENT AMOUNT DUE: \$1,230



UNITED ASSOCIATION

of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry of the United States and Canada



2019 APR 30 AH 10: 22

Attachment 1 1 Page

April 26, 2019

Mark McManus General President

Patrick H. Kellett General Secretary-Treasurer

Michael A. Pleasant
Assistant General President

Founded 1889

UA Local Union:

Letters should be confined to one subject

Subject:

Federal Election Commission Office of Administrative Review 1050 First Street, NE Washington, D.C., 20002

RE: Patrick Dolan, in official capacity as Treasurer

Pipefitters Local Union #524

AF#: 3645

To whom it may concern,

I am writing to contest the civil penalty in the amount of \$1,230 imposed by the Federal Election Commission on March 21, 2019 for failing to file timely the 30 Day Post-General Report of Receipts and Disbursements.

On April 2, 2019 the Pipefitters Local Union #524 PAC Fund filed the following reports:

- 1) October Quarterly Report covering the period 7/1/2018 9/30/2018
- 2) 30 Day Post General Report covering the period 10/1/2018 11/26/2018
- 3) Year-End Report covering the period 11/27/2018 12/31/2018
- 4) Termination Report covering the period 1/1/2019 4/2/2019
- 5) F99 Miscellaneous Report explaining the reason for filing the termination report

All the reports listed above from number one to number three were filed with zeros as there were no contributions made to federal candidates. The Pipefitters Local Union #524 Political Committee Fund only makes contributions to state and local candidates not federal candidates. Therefore, Pipefitters Local Union #524 Political Committee Fund should not be filing reports with the Federal Election Commission.

The Pipefitters Local Union #524 Political Committee Fund should not have been registered to file FEC reports so we have filed a termination report.

I have attached a copy of the FEC confirmation for all the reports that were filed with the FEC on April 2, 2019 with the help of Caitlin and Andrea from the FEC.

Please update your records to avoid any future notices regarding any of the reports listed on this letter.

I declare under penalty and perjury that the foregoing is true and correct.

Sincèrely.

Patrick Dolan





May 20, 2019

REVIEWING OFFICER RECOMMENDATION OFFICE OF ADMINISTRATIVE REVIEW ("OAR")

AF# 3645 - Pipefitters Local Union #524 and Patrick Dolan, in his official capacity as Treasurer (C00131706)

Summary of Recommendation

Make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess no civil money penalty.

Reason-to-Believe Background

The 2018 Post-General Report was due on December 6, 2018. The respondents filed the report on April 2, 2019, 117 days late. The report is not election sensitive and was not filed within 30 days of the due date; therefore, the report is considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(1).

On March 21, 2019, the Commission found reason to believe ("RTB") that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2018 Post-General Report and made a preliminary determination that the civil money penalty was \$1,230 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter was mailed to the respondents' address of record from the Reports Analysis Division ("RAD") on March 21, 2019 to notify them of the Commission's RTB finding and civil money penalty.

Legal Requirements

The Federal Election Campaign Act ("Act") states that the treasurer of a committee not authorized by a candidate shall file a post-general report covering through the 20th day after the election no later than 30 days after the election. 52 U.S.C. § 30104(a) and 11 C.F.R. § 104.5(c)(1)(iii). Reports electronically filed must be received and validated at or before 11:59 pm Eastern Standard/Daylight Time on the filing deadline to be timely filed. 11 C.F.R. §§ 100.19(c) and 104.5(e). The treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d).

Summary of Respondents' Challenge

On April 30, 2019, the Commission received the written response ("challenge") from the Treasurer. The challenge states that the Committee filed multiple outstanding reports on April 2, 2019, including the 2018 Post-General Report and a Termination Report. The Treasurer further explains:

The Pipefitters Local Union #524 Political Committee Fund only makes contributions to state and local candidates not federal candidates. Therefore, Pipefitters Local Union #524 Political Committee Fund should not be filing reports with the Federal Election Commission. The Pipefitters Local Union #524 Political Committee Fund should not have been registered to file reports so we have filed a termination report.

Analysis

A committee's filing obligation ends only when the committee files a termination report, and the Commission notifies them in writing that their termination report has been accepted. 11 C.F.R § 102.3; Campaign Guide for Corporations and Labor Organizations, 169. At the time of the RTB finding, the Committee had not yet filed a termination report with the Commission. Therefore, the respondents were required to timely file the 2018 Post-General Report. The Reviewing Officer recommends that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a).

At the time of the RTB finding, the Commission used an estimated level of activity (\$32,477) to calculate the penalty because the 2018 Post-General Report had not yet been filed. 11 C.F.R § 111.43(d)(2)(i). The 2018 Post-General Report filed April 2, 2019 discloses \$0 in total receipts and \$0 in total disbursements during the reporting period. Therefore, the actual level of activity for the 2018 Post-General reporting period is \$0. Using the schedule of penalties at 11 C.F.R § 111.43(a), no civil money penalty should be assessed for a level of activity of \$0.

The Reviewing Officer recommends that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess no civil money penalty.

OAR Recommendations

- 1. Adopt the Reviewing Officer recommendation for AF# 3645 involving Pipefitters Local Union #524 and Patrick Dolan, in his official capacity as Treasurer, in making the final determination;
- 2. Make a final determination in AF# 3645 that Pipefitters Local Union #524 and Patrick Dolan, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess no civil money penalty (reduced from the RTB civil money penalty of \$1,230); and
- 3. Send the appropriate letter.

Attachments

Attachment 1 -

Attachment 2 – Page 169 of Campaign Guide for Corporations and Labor Organizations Attachment 3 – Declaration from RAD

Attachment 4 – Declaration from OAR

CHAPTER 12

Termination and debt settlement

This chapter discusses how SSFs can settle any outstanding debts and terminate their registration with the FEC. It also addresses the obligations that corporations that are commercial vendors have to political committees under the law, and the conditions under which they may settle debts with political committees.

1. Terminating the committee

An SSF may terminate its registration and reporting obligations by filing a termination report at any time, provided that:

- The committee no longer intends to receive contributions or make expenditures; and
- The committee has no outstanding debts or obligations. 102.3(a)(1) and 116.1(a).

SSFs with outstanding debts or obligations should see section 2 of this chapter, "Debt settlement."

Terminations are not accepted when a committee is involved in an FEC enforcement action (MUR), an FEC audit or litigation with the FEC.

Termination report

When filing the SSF's termination report, the treasurer must check the "Termination Report" box on Line 4(a) of the Summary Page of Form 3X. See example 12-1. The termination report must disclose:

- All receipts and disbursements not previously reported, including an accounting of debt retirement (see section 2 of this chapter); and
- The purposes for which any remaining SSF funds will be used. 102.3(a).

Committee no longer required to report once notified

The committee's reporting obligation ends when the Commission notifies the committee that the termination report has been accepted. Until the committee receives this notification, it must continue to file reports.

Disposal of remaining funds

The Commission has concluded that a political committee not authorized by a candidate may expend its funds for any lawful purpose consistent with the Act and Commission regulations. Therefore, an SSF may use its remaining funds for any otherwise legal disbursement, including turning them over to the connected organization's treasury, refunding them to the SSF's contributors or giving them to charity. See AOs 1986-32 (Sino American Coop PAC), 1983-04 (American Federation of Musicians) and 1979-42 (South Carolina National Bank PAC).

DECLARATION OF KRISTIN D. ROSER

 I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.

2. It is the practice of the Reports Analysis Division to document all calls to or from committees regarding a letter they receive or any questions relating to the FECFile software or administrative fine regulations, including due dates of reports and filing requirements.

3. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to Pipefitters Local Union #524:

A) Termination Denial Letter, dated May 14, 2019, referencing the Termination Report covering January 1, 2019 through April 2, 2019 (sent via regular mail to the address of record);

B) Non-Filer Letter, dated December 20, 2018, referencing the 2018 30 Day Post-General Report (sent via electronic mail to: jrobertson@saltercpa.com);

C) Reason-to-Believe Letter, dated March 21, 2019, referencing the 30 Day Post-General Report (sent via overnight mail to the address of record).

4. I hereby certify that I have searched the Commission's public records and find that Pipefitters Local Union #524 filed the 2018 30 Day Post-General Report with the Commission on April 2, 2019.

 Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed at Washington, D.C. on the 15th day of May, 2019.

Ben Holly for KOR

Kristin D. Roser Chief, Compliance Branch Reports Analysis Division Federal Election Commission



May 14, 2019

Patrick Dolan, Treasurer 711 Corey Street Scranton, PA 18505

Dear Treasurer:

On April 2, 2019, you filed a report requesting that the Federal Election Commission permit Pipefitters Local Union #524 (C00131706) to terminate pursuant to 52 U.S.C. § 30103(d) and 11 CFR § 102.3 of the Commission's Regulations. Because of an administrative fines matter involving your committee, your termination request has been denied.

Your committee must continue to file all required reports with the Commission. You will be notified when your request to terminate has been granted and your committee is no longer required to file reports with the Commission. If you have any questions regarding this matter, please do not hesitate to contact Jamie Sikorsky on our toll free number at (800) 424-9530. Her local number is (202) 694-1137.

Sincerely,

Debbie Chacona Assistant Staff Director

hacona

Reports Analysis Division



RQ-7

December 20, 2018

DOLAN, PATRICK, TREASURER PIPEFITTERS LOCAL UNION #524 711 COREY STREET SCRANTON, PA 18505

IDENTIFICATION NUMBER: C00131706

REFERENCE: POST-GENERAL REPORT (10/01/2018 - 11/26/2018)

Dear Treasurer:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced report of receipts and disbursements or failed to file a report covering the entire reporting period as required by the Federal Election Campaign Act, as amended. 52 U.S.C. §30104(a)

It is important that you file this report immediately with the Federal Election Commission, 1050 First Street, NE, Washington, DC 20002. Please note that electronic filers must submit their reports electronically, as per 11 CFR §104.18. A copy of the report or relevant portions must also be filed with the Secretary of State or equivalent State officer unless the State is exempt from the federal requirement to receive and maintain paper copies. You can verify the Commission's receipt of any documents submitted by your committee on the FEC website at www.fec.gov.

The failure to timely file a complete report may result in civil money penalties, an audit or legal enforcement action. The civil money penalty calculation for late reports does not include a grace period and begins on the day following the due date for the report. Due to heightened security screening measures, delivery of mail by the US Postal Service may be delayed. The Commission recommends that you submit your report via overnight delivery or courier service.

If you have any questions regarding this matter, please contact Christopher Ritchie in the Reports Analysis Division on our toll-free number (800)424-9530. The analyst's direct number is (202)694-1146.

PIPEFITTERS LOCAL UNION #524

Page 2 of 2

Sincerely,

Oebbie Chacona

Deborah Chacona Assistant Staff Director Reports Analysis Division

250

DECLARATION OF RHIANNON MAGRUDER

- 1) I am the Reviewing Officer in the Office of Administrative Review for the Federal Election Commission ("Commission"). In my capacity as Reviewing Officer, I conduct research with respect to all challenges submitted in accordance with the Administrative Fine program.
- 2) A committee not authorized by a candidate shall file a post-general report covering through the 20th day after the election no later than 30 days after the election.. Reports filed electronically must be received and validated at or before 11:59 pm, Eastern Standard/Daylight Time on December 6, 2018 for the 2018 Post-General Report to be timely filed.
- 3) I hereby certify that I have searched the Commission's public records and that the documents identified herein are the true and accurate copies of:
 - a) Cover Page, Summary Page, and Detailed Summary Pages of the 2018 Post-General Report filed by Pipefitters Local Union #524 and Patrick Dolan, in his official capacity as Treasurer, and received on April 2, 2019.
- 4) Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington, D.C. on the 20th day of May, 2019.

Rhiannon Magruder

Rhiannon Magruder
Reviewing Officer
Office of Administrative Review
Federal Election Commission

PAGE 1/5

FEC FORM 3X

REPORT OF RECEIPTS AND DISBURSEMENTS

| FORM 3X | | Than An Au | | | | | Office Use Only | · |
|---|-----------------------|--------------------------------------|--|-----------------------------|--|-----------------------------|--------------------|---------------------------------------|
| 1. NAME OF COMMITTEE (in full) | TYPE OR | PRINT V | | mple: If typions the lines. | ng, type | 12FE4M | 5 | |
| PIPEFITTERS LOCAL | . UNION | #524 | | 1111 | | | | لبب |
| | | | 444 | | | | | |
| ADDRESS (number and street) | 711 COF | REY STREET | | - | 444 | | | لبيي |
| Check if different than previously reported. (ACC) | SCRAN | TON | | | | PA | 18505 | - - - - - - |
| 2. FEC IDENTIFICATION N | JMBER ▼ | CI | TY 🛦 | | s | TATE A | · ZIP C | ODE A |
| C c00131706 | | | IS THIS REPORT | | NEW (N) OR | AN (A) | MENDED | |
| 4. TYPE OF REPORT (Choose One) | (b) Mor Rep Dud | ort Las | b 20 (M2) ur 20 (M3) | 1,) ;;; | May 20 (M5) Jun 20 (M6) | 1448 1448 | 20 (M8) 20 (M9) | Year Onlys |
| (a) Quarterly Reports: | | pred. | r 20 (M4) | | Jul 20 (M7) | Oct | 20 (M10) | Year Only) |
| April 15 Quarterly Report (0 | (c) | 12-Day | de constitue de la constitue d | Primary (12) | P) [| General | (12G) | Runoff (12R) |
| July 15 Quarterly Report (0 | Q2) | PRE-Election Report for the: | | Convention | | | | , , , , , , , , , , , , , , , , , , , |
| October 15 Quarterly Report (0 | Q3) | | | ination of | \$ 1 \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ | · | in the | and the second |
| Year-End Report (| (E) | Elect | on on | 1 | <u> </u> | and and the same and areas. | State | of |
| July 31 Mid-Year Report (Non-electic Year Only) (MY) | | 30-Day POST-Election Report for the: | K | General (30) | G) 🛴 | Runoff (| 30R) | Special (30S) |
| Termination Report | | Elect | ion on | M M / | | 2018 | (01 010 | : , |
| | 0 0 | 2018 | | through | 11 11 | | 2018 | |
| I certify that I have examined the Type or Print Name of Treasure | Dolan, F | and to the best o | of my kno | wledge and | belief it is tru | e, correct an | d complete. | |
| Signature of Treasurer | m, Patrick, D | | | [Electronical | ly Filed] D | ate 04 | 02 | 2019 |
| NOTE: Submission of false, error | leous, or inc | complete informati | on may s | ubject the per | rson signing th | is Report to t | he penalties of 5 | 2 U.S.C. § 30109 |
| Office Use Only | | | | | | | FEC FO Rev. 05 | |

SUMMARY PAGE

OF RECEIPTS AND DISBURSEMENTS FEC Form 3X (Rev. 05/2016) Page 2 Write or Type Committee Name **PIPEFITTERS LOCAL UNION #524** To: Report Covering the Period: From: **COLUMN A COLUMN B** This Period Calendar Year-to-Date (a) Cash on Hand 119901.68 January 1, 2018 (b) Cash on Hand at Beginning of Reporting Period..... (c) Total Receipts (from Line 19) (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)..... 0.00 48822.04 7. Total Disbursements (from Line 31)....... Cash on Hand at Close of Reporting Period 127440.06 (subtract Line 7 from Line 6(d)) Debts and Obligations Owed TO the Committee (Itemize all on 0.00 Schedule C and/or Schedule D) 10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) This committee has qualified as a multicandidate committee. (see FEC FORM 1M) For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-694-1100

DETAILED SUMMARY PAGE of Receipts

| FEC Form 3X (Rev. 05/2016) |
|----------------------------|
|----------------------------|

Page 3

| Vrite or Type Committee Name PIPEFITTERS LOCAL UNION #52 | 24 | | | |
|---|--|--|--|--|
| M | M / D D / Y Y Y Y 10 10 10 10 2018 | M W / D D / Y Y Y | | |
| leport Covering the Period: From: | and the same and the same and same | To: 11 26 2018 | | |
| I. Receipts | COLUMN A Total This Period | COLUMN B Calendar Year-to-Date | | |
| Contributions (other than loans) From: | | | | |
| (a) Individuals/Persons Other | | • | | |
| Than Political Committees | Annual Company of Comment of the Com | growing out growing and growing and angles of growing and a | | |
| (i) Itemized (use Schedule A) | 0.00 | 56360.42 | | |
| | Transantian anticonordita anticonordina del formation a describita de la contraction a di production anticonordina del contraction a quantitativa de la contraction a quantitativa de la contraction del contraction de la contract | de transference de constante estado en estado en estado en estado en estado en estado en entre en el constante A constante en entre en entre en estado en entre | | |
| (ii) Unitemized | 0.00 | 0.00 | | |
| (iii) TOTAL (add | han and the confidence of the confidence described the confidence of the confidence | kan sa milinang sa kitang sa Marang da mana di sa malil bin mendintan sa milina sa kaling sa malil Jaman nganara sa panan ngga mananggan sa mga na kangga na naga mangga mangga na naga sa mangga na mangga manan | | |
| Lines 11(a)(i) and (ii) | 0.00 | 56360.42 | | |
| | 0.00 Berlin and the conflict of the conflict o | has a dia matamataka militari militari ya kasa di Karatan di kasa di kasa di kasa di kasa di kasa di kasa di Ana ngara maga manga | | |
| (b) Political Party Committees | 0.00 | 0.00 | | |
| (c) Other Political Committees | To consider the model the model and the model and the consideration of t | ment historial medit har strumbundhen ditang ment an ditu an mengana spesimbung menganang menganang menganang | | |
| (such as PACs) | 0.00 | 0.00 | | |
| (d) Total Contributions (add Lines | harrier and harrist the same of the same o | has a street and the control of the second and the | | |
| * * | t manging samily ang alika makatan planan planan planan da manka sa makatan salah sa milingan sakara sa kara s T | aga da tanang kabanang kabang kabang kang pananang pananan di pananan aga kanan ng pananan aga sanan aga sanan | | |
| 11(a)(iii), (b), and (c)) (Carry | 0.00 | 56360.42 | | |
| Totals to Line 33, page 5) | be and in with could be each produce the will an income the all the will are in | hour after mothers of Atlanta Homosolan and Atlanta Atlanta Atlanta Atlanta A | | |
| Transfers From Affiliated/Other | And the second s | the control of the co | | |
| Party Committees | 0.00 f | 0.00 Sanding of the self to a three th | | |
| And Devices | | t in the state of | | |
| All Loans Received | 0.00 j | 0.00 To make make make parabagan kan dan dalam dan dan dan dalam dan dalam dan dalam dan dalam dan dalam dan dalam d | | |
| | han a han a de a a all a a all a a all a a al a a a de a a a de a a al de a | English de types of the constitution of the co | | |
| Loan Repayments Received | 0.00 | 0.00 | | |
| Offsets To Operating Expenditures | han an bana atkan ath de galamantan a the an that an area. This is also and | den er er film er er e 19 men till stans målere er ellere er fillede mendler en er filmen er fillette men fj | | |
| (Refunds, Rebates, etc.) | and the state of the | the control of the co | | |
| (Carry Totals to Line 37, page 5) | 0.00 | 0.00 | | |
| Refunds of Contributions Made | t on Alexandra Marcall annahamil land ber sekan flamasikan di | Samuel and the control of the same of | | |
| to Federal Candidates and Other | Engineering was defined and byte considerate and the consideration of the consideration of the consideration of | | | |
| Political Committees | 0.00 | 0.00 | | |
| Other Federal Receipts | In a large translit with a second process of the contract of t | h ama kaon a lamadhlanachann da a blian mha an dtuaight fair a | | |
| (Dividends, Interest, etc.) | 0.00 | 0.00 | | |
| Transfers from Non-Federal and Levin Fund | ் நிரு நடிய நடிய நடிய நடிய நடிய நடிய நடிய நடிய | and marker of the selection of the selec | | |
| (a) Non-Federal Account | the state of the s | Parantaga and an analysis and | | |
| (from Schedule H3) | 0.00 | transferrander endmander demostration de modernation en de moderna | | |
| (Holli Collocalo I lo) | handmadamidhamhamhamhas thiomhamhamhathamh | 0.00 | | |
| | | the second state of the second control to th | | |
| (b) Levin Funds (from Schedule H5) | 0.00 j | 0.00 | | |
| | Expression and the content of a succession of the content of the c | in the second | | |
| (c) Total Transfers (add 18(a) and 18(b)) | 0.00 | 0.00 | | |
| Total Receipts (add Lines 11(d), 12, 13, 14, 15, 18, 17, and 18(c)) | | 56360.42 | | |
| | Cook | 30300.42 | | |
| Total Federal Receipts | | · · | | |
| • | . 0.00 | F6260.40 | | |
| (subtract Line 18(c) from Line 19)▶ | Anna tananata araka arak araka arak arak arak arak | 56360.42 | | |

DETAILED SUMMARY PAGE

of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 4

| | | II. Disbursements | COLUMN A Total This Period | COLUMN B |
|------------|-------------|--|--|--|
| 21. | Ope (a) | rating Expenditures: Allocated Federal/Non-Federal Activity (from Schedule H4) | dia ins reriod | Calendar Year-to-Date |
| | | (i) Federal Share | 0.00 | 0.00 |
| | | • | and a subject of the control of the | The state of the s |
| | | (ii) Non-Federal Share | 0.00 | 0.00 |
| | (b) | Other Federal Operating | la est est de la capación de la cap La capación de la cap | ha marken militar si Patrio di markama Matrio Maria di markama (h. 17. 17. 17. 17. 17. 17. 17. 17. 17. 17 |
| | | Expenditures | 0.00 | 48822.04 |
| | (c) | Total Operating Expenditures | beranden verdige in Regeristanse fan it Referenciaen in Albert in de steel de steel fan de ferste fan de fers General general | ters allege sites of the college of |
| | ν, | (add 21(a)(i), (a)(ii), and (b)) | 0.00 | 48822.04 |
| 20 | Trac | nsfers to Affiliated/Other Party | the matter of the college of the col | man the and on the section of the se |
| 22. | | mittees | 0.00 | · · |
| 23. | | tributions to | Lindon do Hardanda Marija ata Madada | 0.00 |
| Ī | Fed | eral Candidates/Committees Other Political Committees | 0.00 | 0.00 |
| 24. | Inde | pendent Expenditures | hang all a saide and left and sugar the public and the author and left and the and for a finite and for a said and the sai | h marik membasai Kenadimantia milik muhimanta milik maka melandi likuri di litur. Kenadi Jamaguntukan mjarangan mejarangan megarangan mengan mengan mengan mengan mengan mengan mengan mengan mengan m |
| | | Schedule E) | 0.00 | 0.00 |
| 25. | Coo | rdinated Party Expenditures | because a make on the analysis of his able from their above the make and for a second of the second | man all a martina all transitions and nor the most report of a self to be a self to |
| | (DZ (USE | U.S.C. § 30116(d)) Schedule F) | 0.00 | • |
| | , | | remarkanin tiran tihan milan salam salam tiran tiran tiran tiran titan titan tiran tiran tiran tiran tiran tir | 0.00 |
| 26 | 100 | A Dangumanta Mada | | beauther as beauth in the street and the street in the str |
| 20. | LUA | n Repayments Made | 0.00 | 0.00 |
| | | | ham dissert describble and research as the conductor is a different and a second of the conductor and | more than the control of the control |
| 27. 28. | Loa | ns Madeunds of Contributions To: | 0.00 j | 0.00 |
| LU. | | Individuals/Persons Other | Berger Berger Steiner Steine Steine in der steine Steine Steine steine Steine Steine Steine Steine Steine Stein Leine gegeberg steine Stein | have also produced his attended in place the continue of the c |
| | | Than Political Committees | 0.00 | 0.00 |
| | | ١ | Francisco de la contrata de la cont La contrata de la co | hayan dharan karad bir an karad an al-linan karad pantili in an karad na dibiran karad la sa dibiran karad la Garan faran ay an angan magan m |
| | (b) | Political Party Committees | 0.00 | 0.00 |
| | (c) | Other Political Committees | According to the collision of the professional free or of the condition of the collision of | Beauthorn Francisco (Beauthorn Beauthorn Beauthorn Beauthorn) |
| | | (such as PACs) | 0.00 | 0.00 |
| | (d) | Total Contribution Refunds | I mentioned and have by material and much made and another and | Employee Samuel Comment of the Comme |
| | (-, | (add Lines 28(a), (b), and (c)) | hermod- and considerations control of the control of the control of | and the state of the |
| | | (122 21105 25(4), (5), 410 (5), | المستحددة والمستحددة المستحددة المستحدد ال | 0.00 |
| 29. | Oth | er Disbursements (Including | Alternative and the state of the complete of the trap of a second state. | elemente estara qualitat qualitat qualitat constituir a conficience estara con communication en estara en esta |
| | Non | -Federal Donations) | 0.00 | 0.00 |
| 30 | Fod | eral Election Activity (52 U.S.C. § 30101) | - Alicenterio de Carlos de Car Carlos | handanikanikanikanikanikanikanikanikanikanik |
| ••• | | Allocated Federal Election Activity | (20)) | |
| | (-, | (from Schedule H6) | | |
| | | - | | - Inga appropriation with a particular conference from the control of a conf |
| | | (i) Federal Share | J. 0.00 J. Landburg and Carlos of Control of | |
| | | | Francisco de como de transcribe como de principa en esta francisco de constituciones de constituciones de la c La como como como esta de como como como como como de constitución de constitución de como como de como como de | A second |
| | | (ii) "Levin" Share | 0.00 | 0.00 |
| | (b) | Federal Election Activity Paid | li permitan santan antik santan menjaman kan atau atau atau atau atau atau atau at | - Emerika ordinad filozofi opedend filozofi om dia ordinad i se silita substanta ordinad se silita substanta o Se se orgina orgina opeden opeden orgina |
| | | Entirely With Federal Funds | 0.00 | 0.00 |
| | (c) | Total Federal Election Activity (add | han disensi madhimal madamidh madamidh as disendi madamidh madamidh madamidh madamidh madamidh madamidh madami Januarja ar garanga magamaga magamaga ay magamaga magamaga magamaga magamaga magamaga | To make a make a militaria di kampilaria pada make kampilataria. Make a militaria make a militaria make a mili Make a make a make a militaria make a make a make a militaria make a militaria make a militaria make a militar |
| | | Lines 30(a)(i), 30(a)(ii) and 30(b)) | 0.00 | 0.00 |
| | | • | Burner and the Marine and Conference and a Million and | Company and Company of the Company of the Company |
| 31. | Tota | l Disbursements (add Lines 21(c), 22, | • | |
| | | 24, 25, 26, 27, 28(d), 29 and 30(c)) | The same of the same states as a support of the same of | Burgash magazay na firm mikan makan karaman andaman diki milan mikan mikan mika b |
| | | ,,,,,, and, | 0.00 | 48822.04 |
| 32. | Tota | I Federal Disbursements | | |
| | | stract Line 21(a)(II) and Line 30(a)(II) | | |
| | - | Line 31) | And the interior to be and the reference of enough in the re- | The interest time of the control of |
| | 11011 | Line 31/ | 0.00 | 48822,04 |
| | | | | |

DETAILED SUMMARY PAGE

of Disbursements

FEC Form 3X (Rev. 05/2016) Page 5 III. Net Contributions/ **COLUMN A** COLUMN B **Total This Period** Calendar Year-to-Date **Operating Expenditures** 33. Total Contributions (other than loans) (from Line 11(d), page 3) 34. Total Contribution Refunds (from Line 28(d))..... 35. Net Contributions (other than loans) 56360.42 0.00 (subtract Line 34 from Line 33) 36. Total Federal Operating Expenditures 0.00 48822.04 (add Line 21(a)(i) and Line 21(b)) 37. Offsets to Operating Expenditures (from Line 15, page 3)..... 38. Net Operating Expenditures 0.00 48822.04

May 22, 2019

Patrick Dolan, in official capacity as Treasurer Pipefitters Local Union #524 711 Corey Street Scranton, PA 18505

C00131706 AF#: 3645

Dear Mr. Dolan:

On March 21, 2019, the Federal Election Commission ("Commission") found reason to believe ("RTB") that Pipefitters Local Union #524 and you, in your official capacity as Treasurer ("respondents"), violated 52 U.S.C. § 30104(a) for failing to timely file the 2018 Post-General Report. The Commission also made a preliminary determination that the civil money penalty was \$1,230 based on the schedule of penalties at 11 C.F.R. § 111.43.

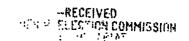
After reviewing your written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission make a final determination and assess no civil money penalty. A copy of the Reviewing Officer's recommendation is attached.

You may file with the Commission Secretary a written response to the recommendation within 10 days of the date of this letter. Your written response should be sent to the Commission Secretary, 1050 First Street, NE, Washington, DC 20463 or via facsimile (202-208-3333). Please include the AF # in your response. Your response may not raise any arguments not raised in your original written response or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). The Commission will then make a final determination in this matter.

Please contact me at the toll free number 800-424-9530 (press 0, then press 1660) or 202-694-1158 if you have any questions.

Sincerely,

Rhiannon Magruder
Rhiannon Magruder
Reviewing Officer
Office of Administrative Review





2019 MAY 28 AM 10: 54 SENSITIVE

May 28, 2019

MEMORANDUM

To:

The Commission

Through:

Alec Palmer

Staff Director

From:

Patricia C. Orrock PCO

Chief Compliance Officer

Rhiannon Magruder *PM*

Reviewing Officer

Office of Administrative Review

Subject:

Final Determination Recommendation in AF# 3645 - Pipefitters Local Union

#524 and Patrick Dolan, in his official capacity as Treasurer (C00131706)

On March 21, 2019, the Commission found reason to believe ("RTB") that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2018 Post-General Report and made a preliminary determination that the civil money penalty was \$1,230 based on the schedule of penalties at 11 C.F.R. § 111.43.

On April 30, 2019, the Commission received their written response ("challenge"). After reviewing the challenge, the Reviewing Officer Recommendation ("ROR") dated May 20, 2019 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference. The Reviewing Officer recommended that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess no civil money penalty.

Within 10 days of transmittal of the recommendation, the respondents may file a written response with the Commission Secretary which may not raise any arguments not raised in their challenge or not directly responsive to the ROR. 11 C.F.R. § 111.36(f). The respondents have indicated they will not be submitting a response.

OAR Recommendations

- 1. Adopt the Reviewing Officer recommendation for AF# 3645 involving Pipefitters Local Union #524 and Patrick Dolan, in his official capacity as Treasurer, in making the final determination;
- 2. Make a final determination in AF# 3645 that Pipefitters Local Union #524 and Patrick Dolan, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess no civil money penalty (reduced from the RTB civil money penalty of \$1,230); and
- 3. Send the appropriate letter.

BEFORE THE FEDERAL ELECTION COMMISSION

| In the Matter of |) | |
|--|---|---------|
| |) | AF 3645 |
| Final Determination Recommendation: |) | |
| Pipefitters Local Union #524 and Patrick |) | |
| Dolan, in his official capacity as |) | |
| Treasurer (C00131706) |) | |

CERTIFICATION

I, Dayna C. Brown, Secretary and Clerk of the Federal Election

Commission, do hereby certify that on June 06, 2019, the Commission decided

by a vote of 4-0 to take the following actions in AF 3645:

- Adopt the Reviewing Officer recommendation for AF# 3645 involving Pipefitters Local Union #524 and Patrick Dolan, in his official capacity as Treasurer, in making the final determination.
- 2: Make a final determination in AF# 3645 that Pipefitters Local Union #524 and Patrick Dolan, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess no civil money penalty (reduced from the RTB civil money penalty of \$1,230).
- 3. Send the appropriate letter:

Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

Dayna C. Brown

Secretary and Clerk of the Commission

June 11, 2019

Patrick Dolan, in official capacity as Treasurer Pipefitters Local Union #524 711 Corey Street Scranton, PA 18505

C00131706 AF#: 3645

Dear Mr. Dolan:

On March 21, 2019, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Pipefitters Local Union #524 and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to file the 2018 Post-General Report. By letter dated March 21, 2019, the Commission sent notification of the RTB finding that included a civil money penalty calculated at RTB of \$1,230 in accordance with the schedule of penalties at 11 C.F.R. § 111.43. On April 30, 2019, the Office of Administrative Review received your written response challenging the RTB finding.

The Reviewing Officer reviewed the Commission's RTB finding with its supporting documentation and your written response. The Reviewing Officer recommended that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess no civil money penalty based on the actual level of activity disclosed on the report. The Reviewing Officer Recommendation was sent to you on May 20, 2019.

On June 6, 2019, the Commission adopted the Reviewing Officer's final determination recommendation and made a final determination that Pipefitters Local Union #524 and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a), and based on the level of activity disclosed on the 2018 Post-General Report (\$0), assessed no civil money penalty (reduced from the RTB civil money penalty of \$1,230). It is based on the same factors used to calculate the civil money penalty at RTB except that the actual rather than the estimated level of activity was used. A copy of the Final Determination Recommendation is attached.

The confidentiality provisions at 52 U.S.C. § 30109(a)(12) no longer apply and this matter is now public. Pursuant to 11 C.F.R. §§ 111.42(b) and 111.20(c), the file will be placed on the public record within 30 days from the date of this notification.

If you have any questions regarding this matter, please contact Rhiannon Magruder on our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,

Ellen L. Weintraul

Ellen L. Weintraub

Chair

Attachment

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 3445